

## **SECTION 15.25: HAZARD COMMUNICATION PROGRAM**

**Last Updated: 11/03**

The purpose of this program is to provide employees with information concerning health and physical hazards of the materials used on the job. It is the employer's responsibility to make this information available, and the employee's responsibility to learn and abide by the requirements of the program.

This manual section is intended to outline activities and training required to come into compliance with 29CFR, Part 1910.1200, and Iowa Code 89B. This manual section, in conjunction with the department/institution's specific worksite procedures (based on the information provided below), should be combined to meet OSHA requirements.

Chemical manufacturers or importers are required to assess the hazards of chemicals which they produce or import. However, in the work setting it is the employer's responsibility to provide information regarding exposure to such hazardous chemicals to their employees. The primary methods of compliance will include:

- Chemical Lists maintained to account for chemicals kept on site.
- Labeling on all containers.
- Training on the safe handling of hazardous chemicals will be provided (prior to working with the chemical) to all affected employees. Employees need to understand Material Safety Data Sheets (MSDS), container labels and codes, and any other chemical handling information which will enable the employee to recognize symptoms of overexposure, risks associated with chemical(s), and protective measures to be taken.
- Upon request, written programs and procedures must be made available by the employer to employees, their designated representative(s), or any local, state, or federal officials who has proper authority. The program will be reviewed periodically (at least annually) to reflect any changes in law or to improve methods or procedures.

Laboratory environments will be required to maintain a Chemical Hygiene Plan. The requirements of this regulation (29 CFR, 1910.1450) are similar to the Hazard Communication Program with the addition of the following:

- Chemical Hygiene Officer must be assigned to administer the program.
- Chemical Hygiene Plan must address procedures, equipment, personal protective equipment, and work practices to protect employees from the health and physical hazards of the laboratory. (Such procedures and plans are advisable under either program.)

Requirements for "minimal exposure operations" such as warehousing, are not as stringent. However, the employer must assure that labels are not removed or defaced, MSDS's are maintained as they are received, and employees will be trained "to the extent necessary to protect them in the event of a spill or leak of a hazardous material from a sealed container." Generally, consumer products and drugs are exempt from this program. The State will rely on information and labeling provided by the manufacturer for the Hazard Communication Program.

### **Training**

All employees who handle or could potentially be exposed to hazardous chemicals must be trained in the following areas:

- The existence and requirements of the hazard communication program.
- Operations and locations where hazardous chemicals are used and stored.

- The physical and health hazards of chemical present.
- Methods and observations (e.g., visual appearance or smell) employees can use to detect the presence or release of hazardous chemicals.
- Measures employees can take to protect themselves from these hazards (work practices, personal protective equipment, and emergency procedures).
- Training will be conducted with each new employee as a part of orientation. All training will be documented, specify material and subjects covered.

Training must also be provided to outside contractors, vendors, or employees temporarily assigned to other work sites (appropriate to the extent of their involvement with the operation). Employees must be made aware of any chemicals brought in by contractor or vendor activities.

Administration of the Hazardous Communication Program can be simplified by creating a centralized location where written material (written program, procedures, and MSDS's) can be accessed. In larger facilities with multiple functions and buildings, it is recommended to keep a master file of all MSDS's with copies of pertinent sheets available at each site.

Community Right-to-Know requirements of the Iowa Code 89B require employers to inform the public (upon request) of the presence of hazardous chemicals in their community (above a certain quantity) and their associated potential health and/or environmental hazards.